

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

CARON NAZARIO,

Plaintiff,

v.

JOE GUTIERREZ, et al.,

Defendants.

Civil Action No. 2:21-cv-00169-RCY-LRL

DEFENDANT JOE GUTIERREZ'S EXHIBIT LIST

Defendant Joe Gutierrez ("Gutierrez" or "Defendant"), through counsel, hereby submits his exhibit list pursuant to Rule 26(a)(3)(A) of the Federal Rules of Civil Procedure and the Court's Scheduling Order dated September 15, 2022 [D.E. 119].

I. EXHIBITS

Documents Gutierrez intends to introduce into evidence at trial.

Ex.

No.

Description

Bates Range

1	New York State Expired In-Transit Permit	CN4536-4537
2	Defendant Gutierrez's Body Worn Camera Video	CN3
3	Defendant Crocker's Body Worn Camera Video	CN4-5
4	Expert Report of Scott Sautter, Ph.D.	
5	Expert Report of Keyhill Sheorn, M.D.	

6	Expert Report of Kenneth Wallentine	
7	Expert Report of Brandon Tatum	
8.	DMV News Release, September 1, 2020	

II. **DISCOVERY**

Gutierrez intends to read into evidence Plaintiff Nazario's Answers to Defendant Gutierrez's Requests for Admission Nos. 1, 4, 19, 20, and 23 without objections.

III. Gutierrez reserves the right to introduce any additional documents as needed for impeachment or rebuttal purposes.

Respectfully Submitted,

JOE GUTIERREZ

/s/ Coreen A. Silverman

John B. Mumford, Jr. (VSB No. 38764)

Coreen A. Silverman (VSB No. 43873)

Jessica A. Swauger (VSB No. 89612)

Hancock, Daniel & Johnson, P.C.

4701 Cox Road, Suite 400

Glen Allen, Virginia 23060

jmumford@hancockdaniel.com

csilverman@hancockdaniel.com

jswauger@hancockdaniel.com

Telephone: (804) 967-9604

Facsimile: (804) 967-9888

Counsel for Defendant Joe Gutierrez

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of November 2022, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Jonathan M. Arthur, Esq. (VSB No. 86323) Thomas H. Roberts, Esq. (VSB No. 26014) Andrew T. Bodoh, Esq. (VSB No. 80143) THOMAS H. ROBERTS & ASSOCIATES, P.C. 105 South 1st Street Richmond, Virginia 23219 Telephone: (804) 783-2000 Facsimile: (804) 783-2105 j.arthur@robertslaw.org tom.roberts@robertslaw.org andrew.bodoh@robertslaw.org <i>Counsel for Plaintiff Caron Nazario</i>	Robert L. Samuel, Jr. (VSB No. 18605) Richard H. Matthews (VSB No. 16318) Anne C. Lahren (VSB No. 73125) Bryan S. Peeples (VSB No. 93709) PENDER & COWARD 222 Central Park Avenue, Suite 400 Virginia Beach, Virginia 23462 Telephone: (757) 490-6293 Facsimile: (757) 502-7370 rsamuel@pendercoward.com rmatthew@pendercoward.com alahren@pendercoward.com bpeeples@pendercoward.com <i>Counsel for Defendant Daniel Crocker</i>
--	--

/s/ Coreen A. Silverman

Coreen A. Silverman (VSB No. 43873)
Hancock, Daniel & Johnson, P.C.
4701 Cox Road, Suite 400
Glen Allen, Virginia 23060
csilverman@hancockdaniel.com
Telephone: (804) 967-9604
Facsimile: (804) 967-9888
Counsel for Defendant Joe Gutierrez